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June 8, 2024

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. Peggy Kuo, U.S.M.J.
225 Cadman Plaza East
Courtroom 11C South
Brooklyn, NY 11201-1804

Re: Aragon v. Brahspati, Inc., et al.
Case No.: 1:22-cv-6342 (EK) (PK)

Dear Judge Kuo:

This firm represents the Defendants in the above-referenced case, who write to respectfully request an extension of time to respond to this Court's Order dated May 31, 2024 (the "Order").

Pursuant to ¶ IV(B) of this Court's Individual Practice Rules, Defendants submit that: (i) the original deadline to respond to the Order was Friday, June 7, 2024; (ii) the reason for the request is because your undersigned is in the midst of preparation for simultaneous hearings on June 14, 2024 before the New York State Industrial Board of Appeals and a contempt hearing before the Hon. Pamela K. Chen, U.S.D.J. on Monday, June 17, 2024 (with a related Rule 32 deposition on June 11, 2024 to boot); (iii) there have been no previous requests for an extension of this deadline; (iv) Plaintiff consents to this request; and (v) the requested extension should not affect any other scheduled dates or deadlines.

Based on the foregoing, Defendants respectfully submit that there exists both good cause and excusable neglect such that this Court should exercise its discretion in favor of granting the requested extension of time. Defendants thank this honorable Court for its time and attention to this case.

Dated: Jamaica, New York

June 8, 2024

Respectfully submitted,

SAGE LEGAL LLC

/s/ Emanuel Kataev, Esq.

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